



Qwest

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Cronan O'Connell

Vice President-Federal Regulatory

October 30, 2002

EX PARTE

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW, TW-A325
Washington, DC 20554

RE: CC Docket Nos. 01-338 and 96-98, In the Matter of Review of the Section 251
Unbundling Obligations of Incumbent Local Exchange Carriers;
Implementation of the Local Competition Provisions of the
Telecommunications Act of 1996

Dear Ms. Dortch:

Yesterday, Cronan O'Connell of Qwest Communications International, Inc., ("Qwest") and Craig Brown, Candace Mowers and Michael Whitt, also of Qwest via telephone, met with the following Federal Communications Commission's staff: Michelle Carey, Thomas Navin, Brent Olson, Ben Childers, Jeremy Miller and Robert Tanner of the Wireline Competition Bureau's Competitive Policy Division. The purpose of the discussion as reflected on the attached presentations concerned unbundled switching, Qwest's transition plan and the local exchange competition environment in Qwest's region, today.

In accordance with FCC rule 1.49(f), this *Ex Parte* letter and attachments are being filed electronically *via* the Electronic Comment Filing System for inclusion in the public record of the above-referenced docket.

Sincerely,
/s/ Cronan O'Connell

cc: Michelle Carey (mcarey@fcc.gov)
Thomas Navin (tnavin@fcc.gov)
Brent Olson (bolson@fcc.gov)
Ben Childers (bchilder@fcc.gov)
Jeremy Miller (jemiller@fcc.gov)
Robert Tanner (rtanner@fcc.gov)

Attachments



Spirit of Service

**Unbundled Switching
October 29, 2002**

Transition Proposal

— *Timeframes*

- Within 60 days of Order, CLEC would declare its preferred transition option.
- Transition existing UNE-P lines to UBS as soon as possible.
- Transition existing UNE-P lines to UNE-L, “hot cuts”, on a negotiated project basis.
- Transition existing UNE-P lines to resale as soon as possible.
- UNE-P orders will be accepted until a few weeks before conversion activity begins.

Switch Removal by UNE “Zone” is Unworkable

- ❑ *States have discretion to determine Zones, resulting in widely varying results within Qwest’s region.*
- ❑ *Qwest experience:*
 - Some states have determined zones based on cost, others based on area.
 - MT and WY employ distance-based zones, resulting in more than one zone per wire center.
 - Results in Qwest territory range from three to five zones per state, with one proposal for up to 166 zones in a single state (Colorado).

Switch Removal by UNE “Zone” is Unworkable

Number of Wire Centers

<u>State</u>	<u>Zone 1</u>	<u>Zone 2</u>	<u>Zone 3</u>	<u>Zone 4</u>	<u>Zone 5</u>	<u>Basis for Zones</u>
AZ	39	33	64	0	0	Wire Centers sorted by Cost
CO	4	50	112	0	0	Wire Centers sorted by Cost - Interim (PUC Proposing by WC, 166 Zones)
IA	13	45	75	0	0	Wire Centers sorted by Cost
ID	10	30	29	0	0	Wire Centers sorted by Cost
MN	1	14	14	129	0	Wire Centers sorted by Cost
MT	NA	NA	NA	NA	0	Zone boundaries determined by distance from C.O.
ND	9	6	18	0	0	Wire Centers sorted by Cost (VLCYNDBC moved to Zone 1)
NE	18	16	35	0	0	Wire Centers sorted by Cost
NM	15	14	35	0	0	Wire Centers grouped by area
OR	40	26	11	0	0	Wire Centers grouped by area
SD	5	4	40	0	0	Wire Centers grouped by area
UT	27	10	32	0	0	Wire Centers grouped by area
WA	2	13	13	14	69	Wire Centers sorted by Cost
WY	NA	NA	NA	NA	0	Zone boundaries determined by distance from C.O.

Qwest Has Demonstrated Ability to Handle Hot Cut Volumes

- ❑ *Today Qwest is successfully transitioning UNE-P to UNE-L.*
 - Customers have begun planning their transition - they are not rolling 100% of their circuits, but are selectively moving circuits in accordance with their switch deployment plans.
 - Currently Qwest is converting 350-500 circuits per day, on a project basis, coordinated by Qwest and the Customer.
 - Throughout this conversion, Qwest has maintained its Hot Cut performance.
 - Qwest charges approximately \$55 - \$59 per Hot Cut (Rate Ordered in Colorado, currently used as a benchmark).

Practical Impacts of Removing Switching from the UNE List

□ *If CLEC Migrates to UNE-Loop:*

- CLEC will submit order to request a service change from UNE-P to UNE-L.
- No change to existing ordering or provisioning processes.
- Collocation arrangement and Local Interconnection Trunking required.
- Qwest will be able to handle resulting Hot Cut volumes without a negative impact on its Hot Cut Performance (currently 98% meeting standard).
- No need for massive network investment as envisioned by AT&T's Electronic Loop Provisioning proposal.

Practical Impacts of Removing Switching from the UNE List (cont'd)

□ *If CLEC migrates to Unbundled Switching (“UBS”) at Market Rates:*

- CLEC will submit order to request a service change from UBS UNE to UBS at market rates.
- No change to existing ordering or provisioning processes.
- Note: Qwest has only one customer in one state purchasing UBS as a stand-alone UNE at this time.

□ *If CLEC migrates to Resale:*

- CLEC will submit order to request a service change from UNE-P to resale.
- No change to existing ordering or provisioning processes.

Implementation Issues

❏ *FCC must clarify that:*

- States do not have authority to require switching to continue to be offered as a UNE.
 - Section 251(d)(3) limitation.
 - Need for certainty.
 - States do not have authority to establish or review “market” prices, as FCC already concluded in the UNE Remand Order.
- To the extent necessary, renegotiation of interconnection agreements for the removal of Unbundled Switching may begin on the date Triennial Review Order is adopted.

Current Qwest UNE-P Product Volumes

Products Provided	AZ	CO	ID	IA	MN	MT	NE	NM	ND	OR	SD	UT	WA	WY	Qwest
UNE-P In Service															
UNE-P POTS (includes POTS and Centrex 21)	30,557	32,894	10,481	2,086	45,359	5,072	4,050	5,352	3,136	26,739	4,262	17,607	39,773	1,777	229,145
UNE-P Centrex (includes UNE-P Centrex Plus and Centron)	4	49,601	0	96,549	37,820	0	0	0	16,884	18,550	13,100	1	7,938	24,821	265,268
UNE-P DSS (DS-1 facilities)	30	110	15	95	200	10	5	18	24	50	3	43	43	14	660
UNE-P-ISDN-BRI	0	0	0	0	2	0	0	0	0	0	0	0	0	0	2
UNE-P-ISDN-PRI (DS-1 facilities)	12	12	0	0	23	3	0	4	5	12	7	16	1	1	96
UNE-P-PAL	6,614	2,163	19	148	1,239	0	0	0	0	2,558	0	0	4,591	0	17,332
UNE-P-PBX	0	0	0	0	1,492	0	0	0	29	134	21	0	0	0	1,676
Total UNE-P in service	37,217	84,780	10,515	98,878	86,135	5,085	4,055	5,374	20,078	48,043	17,393	17,667	52,346	26,613	514,179

August 2002 results

Wholesale Product Pricing Comparison

State	Retail 1FB	Retail 1FR	Resale 1FB	Resale 1FR	UNE-P Zone 1	UNE-P Zone 2	UNE-P Zone 3	UBL
AZ	\$44.81	\$23.74	\$38.15	\$21.42	\$12.54	\$18.28	\$39.88	\$14.00
CO	\$48.16	\$25.69	\$41.42	\$22.82	\$11.30	\$17.70	\$38.13	\$15.85
IA	\$35.46	\$22.61	\$28.47	\$19.01	\$16.66	\$19.19	\$30.82	\$20.42
ID	\$45.73	\$28.59	\$38.86	\$23.10	\$19.39	\$27.59	\$44.50	\$16.47
MN	\$52.48	\$24.65	\$44.17	\$21.34	\$11.13	\$14.45	\$16.31	\$13.00
MT	\$48.84	\$26.33	\$41.75	\$22.55	\$27.57	\$28.20	\$31.43	\$23.72
ND	\$45.09	\$28.78	\$39.26	\$25.17	\$18.88	\$29.02	\$60.54	\$17.51
NE	\$38.91	\$28.57	\$33.66	\$24.97	\$17.06	\$33.03	\$67.42	\$17.79
NM	\$49.27	\$22.84	\$43.25	\$20.33	\$19.20	\$21.49	\$26.85	\$18.52
OR	\$36.29	\$22.30	\$32.62	\$20.35	\$17.10	\$28.41	\$59.42	\$15.36
SD	\$51.96	\$29.34	\$45.13	\$25.77	\$20.07	\$21.45	\$26.75	\$19.15
UT	\$30.14	\$25.00	\$27.42	\$22.74	\$14.71	\$17.65	\$23.11	\$13.03
WA	\$35.66	\$22.33	\$31.41	\$19.99	\$8.97	\$13.96	\$18.88	\$14.01
WY	\$38.00	\$34.19	\$34.60	\$33.63	\$22.75	\$36.07	\$27.22	\$27.10
Average	\$42.91	\$26.07	\$37.16	\$23.08	\$16.95	\$23.32	\$36.52	\$17.57

Wholesale
Pricing Is
Mandated And
De-Averaged:
•State PUCs
•FCC (271)

**Take Away: Recent Price Reductions On UNE-P and UBL
Create Additional Margin Opportunity For CLECs.**

National RBOC Exposure To UNE-P Migration

	State	2000 Pop.	UNE Rates	Retail revenue	Gross Margin	% Gross Margin	Cable Networks
1	California	33,871,648	\$18.08	\$29.81	\$11.73	39%	
2	Texas	20,851,820	\$19.83	\$39.63	\$19.80	50%	
3	New York	18,976,457	\$17.56	\$31.62	\$14.06	44%	
4	Florida	15,982,378	\$21.35	\$33.99	\$12.64	37%	
5	Illinois	12,419,293	\$18.04	\$31.36	\$13.32	42%	
6	Pennsylvania	12,281,054	\$19.43	\$32.18	\$12.75	40%	
7	Ohio	11,353,140	\$15.14	\$34.02	\$18.88	55%	
8	Michigan	9,938,444	\$16.19	\$40.74	\$24.55	60%	
9	New Jersey	8,414,350	\$13.75	\$28.04	\$14.29	51%	
10	Georgia	8,186,453	\$17.84	\$40.44	\$22.60	56%	
11	North Carolina	8,049,313	\$19.96	\$36.18	\$16.22	45%	
12	Virginia	7,078,515	\$18.40	\$33.21	\$14.81	45%	
13	Massachusetts	6,349,097	\$20.48	\$37.42	\$16.94	45%	
14	Indiana	6,080,485	\$17.16	\$32.41	\$15.25	47%	

Take Away: Competitors Elect UNE-P Strategy In The Following Circumstances:
(1) Large Population Markets, and (2) High Margin Markets, and (3) Where Cable
Telephony Platform Is Not Currently In Place.

National RBOC Exposure To UNE-P Migration

	State	2000 Pop.	UNE Rates	Retail revenue	Gross Margin	% Gross Margin	Cable Networks
15	Washington	5,894,121	\$19.07	\$31.98	\$12.91	40%	Seattle/Tacoma - ATT
16	Tennessee...	5,689,283	\$19.34	\$35.14	\$15.80	45%	
17	Missouri	5,595,211	\$20.58	\$36.58	\$16.00	44%	
18	Wisconsin	5,363,675	\$20.65	\$39.21	\$18.56	47%	
19	Maryland	5,296,486	\$16.62	\$37.07	\$20.45	55%	
20	Arizona	5,130,632	\$17.23	\$32.74	\$15.51	47%	Phoenix - Cox
21	Minnesota...	4,919,479	\$15.72	\$32.81	\$17.09	52%	Minneapolis - ATT
22	Louisiana...	4,468,976	\$21.14	\$35.63	\$14.49	41%	
23	Alabama	4,447,100	\$23.63	\$39.29	\$15.66	40%	
24	Colorado...	4,301,261	\$20.52	\$34.48	\$13.96	40%	Denver - ATT
25	Kentucky	4,041,769	\$20.19	\$41.39	\$21.20	51%	
26	South Carolina	4,012,012	\$21.23	\$38.02	\$16.79	44%	
27	Oklahoma	3,450,654	\$21.39	\$31.96	\$10.57	33%	
28	Oregon...	3,421,399	\$19.98	\$33.36	\$13.38	40%	Portland - ATT
29	Connecticut	3,405,565	\$18.84	\$33.74	\$14.90	44%	
30	Iowa...	2,926,324	\$19.67	\$29.96	\$10.29	34%	

Take Away: Competitors Elect UNE-P Strategy In The Following Circumstances:
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National RBOC Exposure To UNE-P Migration

	State	2000 Pop.	UNE Rates	Retail revenue	Gross Margin	% Gross Margin	Cable Networks
31	Mississippi	2,844,658	\$25.17	\$42.00	\$16.83	40%	
32	Kansas	2,688,418	\$18.41	\$34.13	\$15.72	46%	
33	Arkansas	2,673,400	\$18.20	\$51.63	\$33.43	65%	
34	Utah	2,233,169	\$18.06	\$30.59	\$12.53	41%	Salt Lake - ATT
35	Nevada	1,998,257	\$25.65	\$30.55	\$4.90	16%	
36	New Mexico	1,819,046	\$21.59	\$30.22	\$8.63	29%	
37	West Virginia	1,808,344	\$29.68	\$49.57	\$19.89	40%	
38	Nebraska	1,711,263	\$36.18	\$37.95	\$1.77	5%	Omaha - Cox
39	Idaho	1,293,953	\$27.97	\$34.04	\$6.07	18%	
40	Maine	1,274,923	\$19.27	\$36.92	\$17.65	48%	
41	New Hampshire	1,235,786	\$21.68	\$34.43	\$12.75	37%	
42	Rhode Island	1,048,319	\$21.01	\$35.35	\$14.34	41%	
43	Montana	902,195	\$28.12	\$36.29	\$8.17	23%	
44	Delaware	783,600	\$17.78	\$31.86	\$14.08	44%	
45	South Dakota	754,844	\$24.49	\$36.21	\$11.72	32%	
46	North Dakota	642,200	\$23.70	\$37.25	\$13.55	36%	
47	Vermont	608,827	\$18.94	\$37.77	\$18.83	50%	
48	District of Columbia	572,059	\$15.86	\$31.22	\$15.36	49%	
49	Wyoming	493,782	\$27.11	\$42.66	\$15.55	36%	

Take Away: Competitors Elect UNE-P Strategy In The Following Circumstances:
(1) Large Population Markets, and **(2)** High Margin Markets, and **(3)** Where Cable
 Telephony Platform Is Not Currently In Place.

Qwest Trends

Local Competition

- ❑ In Qwest today, local competition includes CLECs, cable companies and wireless companies (see attached pricing plans)**
- ❑ Migration from retail to wholesale is not one for one**
- ❑ For UNE-P, Qwest anticipates that in 2003 UNE-P growth predominately in residential marketplace as rates continue to decrease due to cost dockets**

	ARIZONA	COLORADO	IDAHO	IOWA	MINNESOTA	MONTANA	NEBRASKA	NEW MEXICO	NORTH DAKOTA	OREGON	SOUTH DAKOTA	UTAH	WASHINGTON	WYOMING
AT&T Broadband	Not Offered	1 line 2 lines 3 lines 4 lines Basic local line \$14.75 \$23.00 \$32.00 \$41.00 Line + CW and CID \$22.50 \$31.50 \$40.50 \$49.50 Basic Line + 3 features* \$26.95 \$35.95 \$44.95 \$53.95 Line* + 180 Minutes LD \$37.95 \$46.95 \$53.95 \$64.95 Line* + 300 Minutes LD \$43.95 \$52.95 \$61.95 \$70.95 Line* + 1000 Min. LD \$77.95 \$86.95 \$95.95 \$104.95 *includes Caller ID, Call Waiting, and 3 Way Calling	Not Offered	Not Offered	1 line 2 lines 3 lines 4 lines Basic local line \$14.75 \$23.75 \$32.75 \$41.75 Basic Line + 2 features* \$24.00 \$33.00 \$42.00 \$53.00 Line* + 12 cents LD \$24.00 \$33.00 \$42.00 \$53.00 Line* + 7 cents LD \$26.95 \$35.95 \$44.95 \$53.95 Line* + 180 Minutes LD \$35.95 \$44.95 \$53.95 \$62.95 Line* + 300 Minutes LD \$41.95 \$50.95 \$59.95 \$68.95 Line* + 1000 Min. LD \$76.95 \$85.95 \$94.95 \$103.95 *includes feature pack of Caller ID and Call Waiting	Not Offered	Not Offered	Not Offered	Not Offered	1 line 2 lines 3 lines 4 lines Basic Line \$12.25 \$23.25 \$21.25 \$23.25 \$32.25 \$41.25 \$24.20 \$33.20 \$39.25 \$42.20 \$.07/min LD* \$51.20 \$.07/min LD* \$17.20 \$.07/min LD* \$26.20 \$.07/min LD* \$33.20 \$.07/min LD* \$41.20 180 Minutes* \$67.20 180 Minutes* \$76.20 180 Minutes* \$85.20 * includes basic 1FR Two Feature Pack: CW and CallerID - \$7.75 Multi feature pack: \$12.75 Includes Call Waiting, Caller ID, Anonymous Call Rejection, Call Forwarding Remote Access, Call Forwarding Selective, Call Forwarding Variable, Call Return, Call Screening, Distinctive Ringing, Speed Dial 30, and Three Way Calling 1000 Minutes* \$67.20 \$76.20 \$85.20 \$94.20 * includes basic 1FR	Not Offered	1 line 2 lines 3 lines 4 lines Basic Line \$12.25 \$21.25 \$30.25 \$39.25 \$41.20 180 Minutes* \$24.20 \$33.20 \$42.20 \$51.20 300 Minutes* \$30.20 \$39.20 \$48.20 \$57.20 600 Minutes* \$46.20 \$55.20 \$64.20 \$73.20 1000 Minutes* \$67.20 \$76.20 \$85.20 \$94.20 * includes basic 1FR	Not Offered	

	ARIZONA	COLORADO	IDAHO	IOWA	MINNESOTA	MONTANA	NEBRASKA	NEW MEXICO	NORTH DAKOTA	OREGON	SOUTH DAKOTA	UTAH	WASHINGTON	WYOMING
Cox Cable	1st Line - \$11.75 2nd Line - \$8.50 Caller ID - \$5.95 Call Waiting - \$4.95 Call Waiting ID - \$9.00 Three-Way Calling - \$2.75 Voice Mail - \$4.95 Wirelink(Linebacker) Free	Not Offered	Not Offered	1st Line - \$11.39 2nd Line - \$6.50 Caller ID - \$6.50 Call Waiting - \$4.90 Call Waiting ID - \$4.90 Call Waiting ID - \$11.00 Three-Way Calling - \$3.40 Voice Mail - \$5.90 Wirelink(Linebacker) Free	Not Offered	Not Offered	1st Line - \$15.89 2nd Line - \$7.89 Caller ID - \$6.50 Call Waiting - \$4.90 Call Waiting ID - \$11.00 Three-Way Calling - \$3.40 Voice Mail - \$5.90 Wirelink(Linebacker) Free	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered
MCIWorldCom	\$59.99 includes unlimited LD, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling + Voicemail.	\$59.99 includes unlimited LD, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling + Voicemail.	Not Offered	\$57.99 includes unlimited LD, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling + Voicemail. \$31.99 includes unlimited LD only to other MCI Neighborhood customers, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling <u>Voicemail extra = \$6.00</u>	\$55.99 includes unlimited LD, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling + Voicemail. \$31.99 includes unlimited LD only to other MCI Neighborhood customers, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling <u>Voicemail extra = \$6.00</u>	Not Offered	Not Offered	Not Offered	\$57.99 includes unlimited LD, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling + Voicemail.	\$55.99 includes unlimited LD, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling + Voicemail. \$31.99 includes unlimited LD only to other MCI Neighborhood customers, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling <u>Voicemail extra = \$6.00</u>	Not Offered	\$59.99 includes unlimited LD, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling + Voicemail. \$31.99 includes unlimited LD only to other MCI Neighborhood customers, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling <u>Voicemail extra = \$6.00</u>	\$55.99 includes unlimited LD, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling + Voicemail. \$31.99 includes unlimited LD only to other MCI Neighborhood customers, local calling, call waiting, caller ID, Speed Dial 8, Three-Way Calling <u>Voicemail extra = \$6.00</u>	Not Offered

	ARIZONA	COLORADO	IDAHO	IOWA	MINNESOTA	MONTANA	NEBRASKA	NEW MEXICO	NORTH DAKOTA	OREGON	SOUTH DAKOTA	UTAH	WASHINGTON	WYOMING
McLeodUSA	Not Offered	Basic Package (local, LD. Call Waiting) \$19.92 Simple Package (Local, LD)..... \$14.92 Call Forward Variable..... \$3.00 Speed Calling 6..... \$2.00 Call Forward Don't Answer..... \$0.80 Call Forward Busy..... \$0.30 Call Forward B/DA..... \$1.00 Call Waiting..... \$4.50 Speed Calling 30..... \$3.00 Three Way Calling..... \$3.50 Caller ID Number Only..... \$6.95 Caller ID Name and Number..... \$6.95	Basic Package (local, LD. Call Waiting) \$17.93* Simple Package (Local, LD)..... \$19.35** \$22.13*** Simple Package (Local, LD)..... \$14.76 / \$13.96 Call Forward Variable..... \$3.00 Speed Calling 8..... \$2.00 Call Forward Don't Answer..... \$0.65 Call Forward Busy..... \$0.30 Call Forward B/DA..... \$0.85 Call Waiting..... \$5.10 Speed Calling 30..... \$3.00 Three Way Calling..... \$3.50 Caller ID Number Only..... \$6.95 Caller ID Name and Number..... \$6.95	Rate Group 2 Rate Group 3 First Line \$17.15 \$18.15 Additional Lines \$11.68 \$12.65 Waiting..... \$5.50 Call Forwarding..... \$3.00 Speed Calling 6..... \$2.00 Toll Denial..... \$5.95	Basic Package (local, LD. Call Waiting) \$19.86 / \$19.06 Metro/Outstate Simple Package (Local, LD)..... \$14.76 / \$13.96 Call Forward Variable..... \$3.00 Speed Calling 8..... \$2.00 Call Forward Don't Answer..... \$0.65 Call Forward Busy..... \$0.30 Call Forward B/DA..... \$0.85 Call Waiting..... \$5.10 Speed Calling 30..... \$3.00 Three Way Calling..... \$3.50 Caller ID Number Only..... \$6.95 Caller ID Name and Number..... \$6.95	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Simple Package (Local, LD)..... \$18.15 Basic Package (Local, LD, CW)..... \$28.60 Additional Lines..... \$23.10 Zone charges: \$11.71 is added in certain areas Call Forward Variable..... \$3.00 Speed Calling 8..... \$2.00 Call Forward Don't Answer..... \$0.60 Call Forward Busy..... \$0.25 Call Forward B/DA..... \$0.60 Call Waiting..... \$5.50 Three Way Calling (per use)..... \$0.95 Caller ID Number Only..... \$6.95 Caller ID Name and Number..... \$6.95
		Local, LD. Call Waiting) \$21.45* \$22.65* Simple Package (Local, LD)..... \$23.15* Additional Lines..... \$15.95* \$17.15* \$17.65* *Rate Groups E, G and I Call Forward Variable..... \$3.00 Speed Calling 6..... \$2.00 Call Forward Don't Answer..... \$0.60 Call Forward Busy..... \$0.25 Call Forward B/DA..... \$0.60 Call Waiting..... \$5.50 Three Way Calling (per use)..... \$0.95 Caller ID Number Only..... \$6.95 Caller ID Name and Number..... \$6.95												
Seren	Not Offered	Not Offered	Not Offered	Not Offered	Basic Cable + Telephone..... \$38.91 Basic Cable + High Speed Internet + Telephone..\$68.77	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered

	ARIZONA	COLORADO	IDAHO	IOWA	MINNESOTA	MONTANA	NEBRASKA	NEW MEXICO	NORTH DAKOTA	OREGON	SOUTH DAKOTA	UTAH	WASHINGTON	WYOMING
US Link	Not Offered	Not Offered	Not Offered	Not Offered	Home Advantage II Line + 2 hours LD per month...\$25.00 Home Advantage III Line + 3 hours LD per month...\$30.00	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered	Not Offered
Z-Tel	\$63.99 includes local line, 100 minutes LD, Caller ID, Call Waiting, 3 Way Calling, Speed Calling, Call Forwarding, Unlimited LD to other Z-Tel customers	\$62.99 includes local line, 100 minutes LD, Caller ID, Call Waiting, 3 Way Calling, Speed Calling, Call Forwarding, Unlimited LD to other Z-Tel customers	Not Offered	\$57.99 includes local line, 200 minutes LD, Caller ID, Call Waiting, 3 Way Calling, Speed Calling, Call Forwarding, Unlimited LD to other Z-Tel customers	\$52.99 includes local line, 200 minutes LD, Caller ID, Call Waiting, 3 Way Calling, Speed Calling, Call Forwarding, Unlimited LD to other Z-Tel customers \$31.99 includes local line, 30 minutes of LD, Call Waiting, Call Forwarding, Free calling to other Z-Tel customers for 90 days.	\$62.99 includes local line, 100 minutes LD, Caller ID, Call Waiting, 3 Way Calling, Speed Calling, Call Forwarding, Unlimited LD to other Z-Tel customers	Not Offered	\$57.99 includes local line, 200 minutes LD, Caller ID, Call Waiting, 3 Way Calling, Speed Calling, Call Forwarding, Unlimited LD to other Z-Tel customers	\$57.99 includes local line, 100 minutes LD, Caller ID, Call Waiting, 3 Way Calling, Speed Calling, Call Forwarding, Unlimited LD to other Z-Tel customers	\$52.99 includes local line, 200 minutes LD, Caller ID, Call Waiting, 3 Way Calling, Speed Calling, Call Forwarding, Unlimited LD to other Z-Tel customers	Not Offered	\$52.99 includes local line, 100 minutes LD, Caller ID, Call Waiting, 3 Way Calling, Speed Calling, Call Forwarding, Unlimited LD to other Z-Tel customers	\$57.99 includes local line, 200 minutes LD, Caller ID, Call Waiting, 3 Way Calling, Speed Calling, Call Forwarding, Unlimited LD to other Z-Tel customers	Not Offered

ources: CCMI tariff database, companies' SEC filings, mailings, advertisements and websites